

Regulatory or Legal Authority or other reference	Item	Agencies with regulatory or other interest in review	Status	Opportunities / Expectations re Community Engagement or Interest
Final Judgement, The People of the State of CA v. AllenCo Energy (aka injunction)	<b>Fenceline Monitoring Plan</b>	South Coast AQMD  LA County Dept of Environmental Health  OEHHA (selection of threshold values for monitored pollutants)	Contained as Exhibit 1 (12 pages) to Injunction  Contractor to provide more complete plan (inclusive of sampling locations and QA/QC protocols, sampling methods, etc., as requested by AQMD)	Expect interest from community in reviewing plan, sampling locations and thresholds.  Opportunity: could the design of website be shared in draft with community?  See note 1 below
DOGGR regs Injunction	Lease Start Up Checklist (aka <b>Start Up Plan</b> ) <i>Includes but not limited to</i>  <ul style="list-style-type: none"> <li>• <b>Idle well testing plan</b></li> <li>• <b>Injection well testing plan</b></li> <li>• <b>Full start up process</b></li> <li>• <b>Operating processes</b></li> <li>• <b>Sound mitigation plan</b></li> <li>• <b>Emissions / Odor Control Plan</b></li> <li>• <b>Preventative Maintenance Program Plan</b></li> <li>• <b>Emergency Operations Plan</b></li> </ul>	<ul style="list-style-type: none"> <li>• DOGGR</li> <li>• South Coast AQMD</li> <li>• US EPA</li> <li>• LA County Dept of Public Health</li> <li>• LAUSD</li> <li>• LA Fire</li> <li>• County Emergency Preparedness and Response</li> </ul>	Currently contained in 3 documents. DOGGR response pending.  (Allenco 3/30/18 checklist; DOGGR 07/05/18 response; Allenco submission, 09/14/18)	Expect public interest in start-up plan  Re odors, encourage revisiting of idea to engage community members in training on odor detection (promotora model)  Re emergency ops plan, see notes 3 – 9 below
AOC, USEPA Oil Pollution Prevention Regs	<b>Spill Prevention and Control and Countermeasure Plan (SPCC)</b>	US EPA	Substantive requirements met, certification of completion yet to be submitted, per EPA email of 9/20/18.	

Regulatory or Legal Authority or other reference	Item	Agencies with regulatory or other interest in review	Status	Opportunities / Expectations re Community Engagement or Interest
			Any new/untrained operational staff must be trained prior to startup.	
AOC, USEPA	<b>Preventative Maintenance Program Plan</b> for tanks, pressure vessels, piping and pressure relieving devices) (also included below)	USEPA	Most substantive requirements met, certification of completion yet to be submitted, per EPA email of 9/20/18.	
South Coast Rule 1173	Leak Detection and Repair Plan	South Coast AQMD	Submitted and available to South Coast inspectors for review (confirm)	
	Hazardous Materials Business Plan (includes emergency management info)	LA Fire		

Items 1 – 9 recommended by LA County Environmental Health as critical elements.

1. Complete a full scope operationalized Fenceline Monitoring Plan to include a defined actionable table (steps and actions), identified minimum and maximum thresholds, measurable results, actionable results, and triggers that advance to higher response levels.
2. Complete an ODOR PREVENTION AND SURVEILLANCE PROGRAM to prevent and control hydrogen sulfide (rotten egg) and petroleum odors from reaching the community.
3. Complete a notification plan for alerting all interagency partners during events and including actionable results, triggers, notification call down, time periods, scripted messaging, further action (stand up or stand down emergency procedures).
4. Complete a Risk Communication Plan for notifying internal (interagency partners) and external (community members) groups on messaging depending on the Event Levels, Actionable Results, and to include defined further steps and actions.
5. Ensure the plan aligns with the City of Los Angeles Emergency Management Department and City Emergency Operations Plan for emergency response.
6. Ensure all stakeholders are trained on the plan and participate in exercises that are evaluated before start-up.
7. Exercise the plan utilizing an Improvement Action Plan for annual updating.
8. Complete a site location law enforcement Threat Assessment in concert with the Federal Bureau of Investigation Joint Terrorism Task Force.
9. Develop a comprehensive Risk Management Program (RMP) with relevant federal, state and local agencies, the public and other community stakeholders, that evaluates, mitigates, and prepares for facility incidents to reduce the risk to the public. It is recommended that the RMP

documents be accessible to the public and include, but not be limited to: Hazard Assessment; Prevention Program; and Emergency Response Plan. *[Confirm state or local authority to require such a plan.]*